

# Angus James Bell, Esq.

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June 3, 2021

Via ECF

Hon. John P. Cronan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: *United States v. Oscar Rios*, 20Cr673

Dear Judge Cronan:

I am CJA appointed counsel for Mr. Oscar Rios who is charged with Conspiracy to Conspiracy to Commit Hobbs Act Robbery in the above referenced matter.

I write to request approval for the appointment of Yusuf El Ashmawy, Esq. as associate counsel for the purpose of reviewing and summarizing discovery materials, as well as visiting and conferring with the client at the rate of \$90 per hour. As discussed at our recent status conference, the Government recently produced several terabytes of discovery that we need to review with Mr. Rios and then determine if we plan to file any substantive motions. Mr. El Ashmawy is an experienced attorney with extensive expertise in reviewing voluminous discovery in both electronic and document form, preparing legal memoranda and trial preparation. Given the schedule outlined at the conference, Mr. El Ashmawy would be a valuable addition to the defense and will result in significant cost savings to the Court.

I further submit that such appointment is necessary for the effective representation of this indigent defendant and is consistent with the statutory authority for the provision of ancillary services in an appointed case. Counsel specifically requests approval for an initial 100 hours at \$90 hours without prejudice to seeking authority for additional time should the review goes beyond the 100 hours.

Thank you in advance for any and all consideration of this application. We will await further instructions from the Court on this matter.

Respectfully submitted,

  
A James Bell, Esq.

Cc: All counsel, by ECF

This request is approved.

SO ORDERED.

Date: June 8, 2021

New York, New York



JOHN P. CRONAN

United States District Judge